

Alliance Defense Fund™

"Without Me you can do nothing." —JOHN 15:5

ALAN E. SEARS
President & General Counsel

8960 E. Raintree Drive • Suite 300
Scottsdale, Arizona 85260

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RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

December 15, 2000

Mr. Jeff S. Jordan
Supervisory Attorney
Central Enforcement Docket
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RE MUR 5142

Dear Mr. Jordan:

We are in receipt of your letter, the complaint, and other documents, dated November 9, 2000. It was sent to the Alliance Defense Fund's ["ADF"] post office box as opposed to our street address, and did not arrive at our office until December 1, 2000.

Scott Phillips, ADF Corporate Counsel, previously wrote and spoke to Legal Specialist Alva Smith in your office, requesting an extension of time until December 15, 2000, to submit an answer. She orally granted the request on December 4, 2000.

Source for Name in Question

ADF did not obtain the name in question from the Federal Election Commission. According to source code information, ADF obtained the name and address of "Tery Spataro," for an October 2, 2000, informational mailing from a list of names entitled "*Rudolph Giuliani for Mayor Donors*" on August 22, 2000. This list was provided to us through the Atlantic List Company, Inc. of Arlington, Virginia, Confirmation No. 72201. ADF receives names of potential ministry friends from a plethora of sources, including referrals, ministries, and organizations.

ADF's Position Regarding Donor Names

ADF has not, and will not, utilize names listed by the Federal Election Commission for soliciting contributions, or for commercial purposes. ADF takes seriously the rights of individuals who have contributed their hard earned resources to causes in which they believe, as is evidenced by ADF's own 10 point "Donor's Bill of Rights," copied in the documents you sent to our office, now a part of FEC records.

ADF FOUNDERS

BILL BRIGHT
*Campus Crusade
for Christ*

LARRY BURKETT
*Christian Financial
Concepts*

JAMES DOBSON
Focus on the Family

D. JAMES KENNEDY
Corral Ridge Ministries

MARLIN MADDOUX
*"Point of View"
Radio Program*

WILLIAM PEW
Maranatha Foundation

DON WILDMON
*American Family
Association*

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December 13, 2000
Mr. Jeff S. Jordan

Upon review of your records you will find that ADF's first right of our donors' states: "*To know that ADF will never sell, rent, or make available your name or information related to your gifts.*" Please also note the third right which states: "*To know that ADF is in compliance with federal, state, and municipal laws.*"

Precautions Taken Regarding Unwanted Mail

In addition to strict adherence to all laws governing direct mail solicitations, ADF has also implemented measures to prevent mailing to those who do not wish to receive direct mail, even though the law clearly allows the mailing.

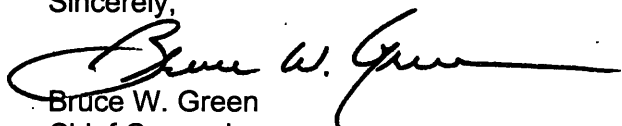
Upon obtaining any new name, ADF compares the name against a list of those individuals who have voluntarily registered with the "Direct Mail Association" [DMA] to exclude themselves from direct mail solicitations. When a name obtained by ADF matches a name on the list from DMA, ADF does not mail to that individual.

Conclusion

As set forth above, the Alliance Defense Fund did not obtain the name in question from the Federal Election Commission, and ADF has not violated the Federal Election Campaign Act of 1971.

If you have any other questions, please contact me at (480) 444-0020.

Sincerely,


Bruce W. Green
Chief Counsel

BWG/cjs

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